

SHER TREMONTE LLP

December 15, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Sakoya Blackwood*, 22 Cr. 460 (JMF)

Dear Judge Furman,

We represent Ms. Blackwood in the above-captioned case. We are mindful of the Court's instruction that no further adjournments will be granted, but nevertheless write with good cause to respectfully request one final adjournment of the pretrial motion deadline, scheduled for January 6, 2023.

This case was indicted on August 30, 2022 and defense counsel was appointed on September 2, 2022 pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A. On September 16, the government made an initial discovery production of over 6 GB. Since then, on October 13, the government also produced an additional 692 GB, consisting of images of electronic devices, including three phones, three laptops, and at least two other devices. Defense counsel has been diligently reviewing the discovery and engaging in discussions with the government, however, additional time is necessary to complete discovery review and continue negotiations, which are complicated by potentially serious immigration consequences.

Additional time is also needed because defense counsel is scheduled to go to trial in another matter on January 17, 2023 before Judge Oetken,¹ and preparing for a January 10, 2023 motions *in limine* deadline for a separate, five-week trial in the District of Oregon. At the time the current motion schedule was proposed, defense counsel did not anticipate that the case before Judge Oetken would be proceeding to trial.

With the government's consent, we propose the following schedule: motions due Feb. 2, 2023; government's opposition due Feb. 17, 2023; reply due Feb. 24, 2023, with a trial scheduled for July, if convenient for the Court.

¹ Defense counsel was appointed as new counsel to that case on the same duty day that resulted in his appointment in Ms. Blackwood's case. That case has been pending since January 6, 2022.

We appreciate the Court's consideration.

Respectfully submitted,

/s/Michael Tremonte
Michael Tremonte
Anna Estevao

CC: AUSAs Mollie Bracewell & Justin Rodriguez, by ECF